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February 28, 2024

VIA ECF

Hon. P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: Fairstein v. Netflix Inc. et al., No. 20-cv-8042 (PKC)

Your Honor:

I represent non-party Penguin Random House LLC (“PRH”). I write to respectfully request a one-week extension of PRH’s time to file a motion seeking the sealing of trial exhibits containing confidential PRH information. Under the Court’s February 15, 2024 Order (Docket No. 344), PRH’s motion is currently due this Friday, March 1, two weeks after the parties filed their proposed pre-trial orders. PRH seeks to extend that deadline to and including March 8, 2024. This is the first request for an extension. Counsel for plaintiff and defendants consent to this request. The next scheduled hearing in this case is set for April 3, 2024.

PRH requests the extension because it is currently in productive discussions with counsel for the parties regarding voluntary steps to resolve PRH’s confidentiality concerns, including potential redactions. PRH is hopeful that, once these discussions are completed, no motion will be needed. However, the parties need more time to complete their discussions before PRH can determine whether any motion to seal will be necessary.

Respectfully submitted,

/s/ Matthew A. Leish

cc: counsel for all parties (via ECF)